

1 TONY M. MAY, ESQ.
2 Nevada Bar No. 8563
3 BRUCE N. WILLOUGHBY, ESQ.
4 Nevada Bar No. 8311
5 **TONY M. MAY, P.C.**
6 1850 E. Sahara Avenue, Suite 206
7 Las Vegas, Nevada 89104
8 Telephone Number (702) 388-0404
9 Email: tmay@tmm-law.com
10 *Attorneys for Defendant, RALPH A. FANDEL*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CORI MUSTIN, as Guardian for HERMAN
E. FANDEL, and the ESTATE OF IRENE E.
FANDEL,

Case No.: 2:15-cv-01430-JCM-PAL

Plaintiffs,

vs.

RALPH A. FANDEL, an individual;
INTERNAL REVENUE SERVICE;
UNIVERSITY MEDICAL CENTER, a
division or department of a political
subdivision of the State of Nevada and
DOES I through X, inclusive,

Defendants.

STIPULATION AND ORDER TO CONTINUE DEADLINES
(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED by and between the parties and their
respective counsel of record, that the Defendants, RALPH A. FANDEL and INTERNAL
REVENUE SERVICE, shall have through and including August 26, 2016 (an additional 74 days
from the current date) to file a responsive pleading to Plaintiff's Motion for Summary Judgment,
filed on April 20, 2016. This continuance is requested to allow the time necessary for the Order
to be entered in Alaska Probate Court, which will in turn resolve this litigation.

IT IS FURTHER STIPULATED AND AGREED by and between the parties and their
respective counsel of record, that Plaintiffs and RALPH A. FANDEL shall have through and
including August 26, 2016 (an additional 74 days from the pending dates) to file a responsive

pleading to Defendant, INTERNAL REVENUE SERVICE'S Motion for Summary Judgment, filed on April 18, 2016. The failure to file a responsive pleading was based on the belief that the action was resolved on or before the dispositive motion deadline.

IT IS FURTHER STIPULATED AND AGREED by and between the parties and their respective counsel of record, that the parties shall have through and including August 26, 2016 (an additional 74 days from the current pending date) to file a Joint Pretrial Order.

This is the second stipulation for an extension of time to file oppositions to Motions for Summary Judgment and to file a Joint Pretrial Order.

THE BALL LAW GROUP

TONY M. MAY, P.C.

By: /s/ Zachary T. Ball
Zachary T. Ball, Esq.
State Bar No. 8364
3455 Cliff Shadows Pkwy., #150
Las Vegas, Nevada 89129
Attorney for *Plaintiffs*

By: /s/ Tony M. May
Tony M. May, Esq.
State Bar No. 8563
Bruce N. Willoughby, Esq.
State Bar No. 8311
1850 E. Sahara Avenue, Suite 206
Las Vegas, Nevada 89104
Attorney for *Ralph A. Fandel*

U.S. DEPARTMENT OF JUSTICE

By: /s/ Gerald A. Role
Caroline D. Ciraolo, Esq.
Gerald A. Role, Esq.
Trial Attorney, Tax Division
P. O. Box 683
Washington, D.C. 20044
Attorneys for *United States of America*

IT IS SO ORDERED.

DATED June 22, 2016.


UNITED STATES DISTRICT JUDGE